



CONF file BB

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
324 EAST ELEVENTH STREET
KANSAS CITY, MISSOURI - 64106

APR 11 1984

Mr. Tom Gross
Kansas Department of Health and Environment
Forbes Field
Topeka, Kansas 66620

Dear Tom:

Enclosed is a copy of the field Notice of Violation issued to Reid Supply Company on April 6, 1984 by the Environmental Protection Agency's inspector John Bosky. Mr. Dale Stuckey accompanied Mr. Bosky on the inspection.

If you have any questions, please call Wayne A. Kaiser, or me at 816/374-7133.

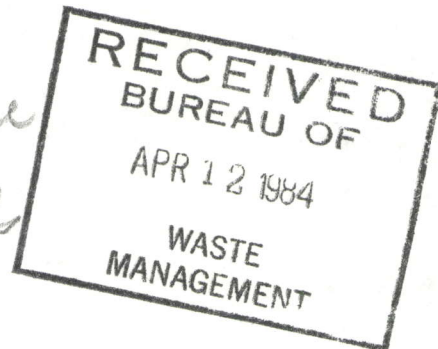
Sincerely yours,

Peter J. Culver
Chief, Air and Waste Compliance Section

Enclosure

*These copies returned to
EPA by Tom Gross since
KDHE was given originals*

WK 5/21



R00001717
RCRA Records Center

*make
case file
more exact*

APR 11 1984

Mr. Tom Gross
Kansas Department of Health and Environment
Forbes Field
Topeka, Kansas 66620

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Enclosure

CONCURRENCES

SYMBOL	<i>AWES</i>						
SURNAME	<i>Culver</i>						
DATE	<i>4/11/84</i>						

Notice of Violation Pursuant to Requirements
of the Resource Conservation and Recovery Act (RCRA).

TO: Facility Name: REFID SUPPLY COMPANY

Address: 2549 NORTH NEW YORK

WICHITA, KANSAS 67211

EPA ID Nbr: KSD007246846

Date: APRIL 6, 1984

During an inspection just completed to determine compliance with the requirements of Subtitle C of RCRA and regulations promulgated pursuant thereto, the following violations were identified:

Citation	Description of Violation
<u>40CFR 265.15(d)</u>	<u>1. INSPECTION LOG DOES NOT INCLUDE NAME OF INSPECTOR</u> <u>CONDUCTING EACH DAILY INSPECTION (SINGLE NAME AT TOP OF LOG</u> <u>1 LOG PAGE COVERS 1 WEEK OF INSPECTION)</u>
<u>40CFR 265.32(e), 34)</u>	<u>2. NO EMERGENCY OR COMMUNICATION OR ALARM EQUIPMENT</u>
<u>40CFR 265.37(a), 3)</u>	<u>3. NO ARRANGEMENTS WITH LOCAL EMERGENCY RESPONSE</u> <u>CONTRACTORS - FOR CONTAINMENT/CLEAN-UP OF A</u> <u>MAJOR SPILL.</u>
<u>40CFR 265.53(b)</u>	<u>4. CONTINGENCY PLAN NOT SUBMITTED TO LOCAL</u> <u>AUTHORITIES WHO MIGHT RESPOND TO FACILITY EMERGENCY</u>
<u>40CFR 265.52(f)</u>	<u>5. LOCATION AND DESCRIPTION OF FACILITY EMERGENCY EQUIPMENT</u> <u>NOT PLACED INTO FACILITY CONTINGENCY PLAN - INFORMATION</u> <u>HAS BEEN DEVELOPED - NOT YET ATTACHED TO</u> <u>CURRENT FACILITY CONTINGENCY PLAN.</u>

This notice is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order (Administrative Civil Complaint) issued pursuant to Section 3008 of RCRA and may not be a complete listing of all violations which may be identified as a result of this inspection.

The _____ is hereby requested to submit in writing within 10 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary correction actions to be taken to:

_____, Chief, Air and Waste Compliance Branch, U.S. Environmental Protection Agency, Region VII, 324 East Eleventh Street, Kansas City, Missouri 64106.

The corrective actions taken by _____ will be considered in determining whether any enforcement action, including the assessment of civil penalties, should be initiated.

If you have any questions on this Notice or wish to discuss your response you may call _____ (U.S. EPA) at 816/374-_____, or _____, at _____.

This Notice prepared by John W. Early Date April 6, 1984

The undersigned person hereby acknowledges that he/she has received a copy of this Notice and has read same.

Distribution:

Original-Facility Rep.

Pink -AWCM

Yellow -ENSV

Green -State

Printed Name: _____

Date _____

Signature: _____

Title: _____

Notice of Violation Pursuant to Requirements
of the Resource Conservation and Recovery Act (RCRA).

TO: Facility Name: REID SUPPLY - CONTINUED

Address: _____

EPA ID Nbr: _____

Date: _____

During an inspection just completed to determine compliance with the requirements of Subtitle C of RCRA and regulations promulgated pursuant thereto, the following violations were identified:

Citation

Description of Violation

40 CFR 265.265.7

6. FAILURE BY TSD FACILITY TO SIGN MANIFEST
USED TO SHIP HAZARDOUS WASTE TO FACILITY

40 CFR 265.176

7. STORAGE OF UNIDENTIFIED HAZARDOUS WASTE LESS
THAN 50 FEET FROM PROPERTY LINE

40 CFR 265.13 (4.1)

8. INSUFFICIENT WASTE ANALYSIS INFORMATION TO
PROPERLY HANDLE WASTES - NO BTA ANALYSIS ON
ALL SEWAGE WASTESTREAMS BLENDED INTO MIXTURE
BURNED AS FUEL - TESTING ON FINAL MIXTURE ONLY

40 CFR 261.6

9. POSSIBLE IMPROPER DISPOSAL OF HAZARDOUS WASTE BY
BLENDING LOW RTU VALUE WASTE INTO MIXTURE
BURNED AS FUEL - FILTER LAKE - SETTLING TANK
WASTE - FACILITY STILL BOTTOMS - OFFSITE WASTES

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This Notice prepared by _____

Date April 6, 1984

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Notice of Violation Pursuant to Requirements
of the Resource Conservation and Recovery Act (RCRA).

TO: Facility Name: REID SUPPLY - CONTINUED

Address: _____

EPA ID Nbr: _____

Date: _____

During an inspection just completed to determine compliance with the requirements of Subtitle C of RCRA and regulations promulgated pursuant thereto, the following violations were identified:

Citation	Description of Violation
<u>40 CFR 263</u> (RECEIVED P.O.T. RECS.)	10. ALLEGED FOR TRANSPORTATION TWO DRUMS IN VERY POOR CONDITION
<u>40 CFR 265.15(a) 1/2(c)</u>	11. FAILURE TO PROPERLY CONDUCT INSPECTION AND TAKE NECESSARY REMEDIAL ACTION - MANY DRUMS IN STORAGE LEAKING AND IN POOR CONDITION
<u>40 CFR 265.15(b)</u>	12. INSPECTION PLAN DOES NOT ADDRESS ALL AREAS WHERE WASTE IS STORED - REAR PLANT AREA, - IN FRONT OF AND AROUND WAREHOUSE AND PROCESSING AREA
<u>40 CFR 265.142(a)</u>	13. LOW CLOSURE COST ESTIMATE - DUE TO EXCESSIVE NUMBER OF DAMAGED WASTES IN STORAGE
<u>40 CFR 265.142(b)</u>	14. CLOSURE COST NOT YET UPDATED SINCE LAST ESTIMATE
<u>40 CFR 265.143(c)</u>	15. USE OF IMPROPERLY WORDED LETTER OF CREDIT TO FUND CLOSURE COSTS - ALSO NOT GUARANTEED TRUST FUND

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_____, Chief, Air and Waste Compliance Branch, U.S. Environmental Protection Agency, Region VII, 324 East Eleventh Street, Kansas City, Missouri 64106.

The corrective actions taken by _____ will be considered in determining whether any enforcement action, including the assessment of civil penalties, should be initiated.

If you have any questions on this Notice or wish to discuss your response you may call _____ (U.S. EPA) at 816/374-_____, or _____, at _____.

This Notice prepared by John W. Borch

Date April 6, 1984

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Distribution:

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Printed Name: _____

Date _____

Signature: _____

Title: _____

Notice of Violation Pursuant to Requirements
of the Resource Conservation and Recovery Act (RCRA).

TO: Facility Name: REID SUPPLY - CONTINUED

Address: _____

EPA ID Nbr: _____

Date: _____

During an inspection just completed to determine compliance with the requirements of Subtitle C of RCRA and regulations promulgated pursuant thereto, the following violations were identified:

Citation	Description of Violation
	16. <u>TEMPORARILY IDENTIFIED WASTES ACCEPTED/STORED</u> <u>BY TSD, DISCREPANCY ON MANIFEST, (DEPLAMER)</u>
40 CFR 265.177(c)	17. <u>CLOSE STORAGE OF INCOMPATIBLE MATERIALS (WASTES)</u> <u>(LARGE OIL-LEAKING CONTAINERS AND SOLVENTS, SLUDGES)</u>
40 CFR 265.173(u)	18. <u>MANY DRAWS IN STORAGE ARE OPEN</u>
40 CFR 265.171	19. <u>MANY DRAWS IN OBVIOUSLY DETRIORATED CONDITION</u>
40 CFR 265.171, 173	20. <u>MANY DRAWS IN STORAGE WERE LEAKING OR</u> <u>APPEARED TO HAVE LEAKED</u>
40 CFR 265.35	21. <u>INADEQUATE AISLE SPACING - WAREHOUSE</u> <u>- IN FRONT OF WAREHOUSE - INSIDE PROCESS AREA FRACE</u> <u>- IN REAR OF PLANT</u>
40 CFR 265.173(b)	22. <u>DRECARIOUS STORAGE - MANY STACKS OF DRAWS ARE</u> <u>LEANING</u>

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_____, Chief, Air and Waste Compliance Branch, U.S. Environmental Protection Agency, Region VII, 324 East Eleventh Street, Kansas City, Missouri 64106.

The corrective actions taken by _____ will be considered in determining whether any enforcement action, including the assessment of civil penalties, should be initiated.

If you have any questions on this Notice or wish to discuss your response you may call _____ (U.S. EPA) at 816/374-_____, or _____, at _____.

This Notice prepared by John W. Borch Date April 6, 1984

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Printed Name: _____

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Signature: _____

Title: _____

Notice of Violation Pursuant to Requirements
of the Resource Conservation and Recovery Act (RCRA).

TO: Facility Name: REID Supply - CONTINUED
Address: _____
EPA ID Nbr: _____ Date: _____

During an inspection just completed to determine compliance with the requirements of Subtitle C of RCRA and regulations promulgated pursuant thereto, the following violations were identified:

Citation	Description of Violation
40 CFR 261.14	23. LACK OF ADEQUATE SECURITY - STORAGE OUTSIDE (<u>OUTSIDE</u>) <u>OUTSIDE</u>
40 CFR 270.71	24. STORAGE OF HAZARDOUS WASTE DESIGNATED AREAS (AREAS LISTED IN PART A & PART B APPLICATIONS)
40 CFR 261.14(c)	25. LACK OF FENCE AROUND ENTIRE FACILITY/ FENCING AT NECESSARY INTERVALS. - FENCE OF PLANT FENCE - FENCE OF PROCESS AREA FENCE ETC.
40 CFR 270.71(3)	26. STORAGE OF HAZARDOUS WASTE IN DRUMS (200) IN EXCESS OF NUMBERS LISTED IN PART A & PART B

This notice is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order (Administrative Civil Complaint) issued pursuant to Section 3008 of RCRA and may not be a complete listing of all violations which may be identified as a result of this inspection.

The REID Supply Company is hereby requested to submit in writing within 10 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary correction actions to be taken to:
WILLIAM J. SANDERSON, Chief, Air and Waste Compliance Branch, U.S. Environmental Protection Agency, Region VII, 324 East Eleventh Street, Kansas City, Missouri 64106.
The corrective actions taken by REID Supply will be considered in determining whether any enforcement action, including the assessment of civil penalties, should be initiated.

If you have any questions on this Notice or wish to discuss your response you may call WAYNE KAISER (U.S. EPA) at 816/374-7133, or TOM GROSS KDMB at 913/462-9360

This Notice prepared by John W. Boshy Date April 6, 1984

The undersigned person hereby acknowledges that he/she has received a copy of this Notice and has read same.

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Green -State

Printed Name: David G. Trembold Date 4/6/84
Signature: David G. Trembold
Title: Hazardous Waste Coordinator